



**SEEEMA M. SINGH, ESQ.**  
*Acting Ratepayer Advocate  
and Director*

***Via Electronic Filing***

**Re: I/M/O Presubscribed Interexchange Carrier Charges  
CC Docket No. 02-53 CCB/CPD File No. 0112, RM 10131**

The New Jersey Division of the Ratepayer Advocate hereby submits this letter and attachments in lieu of more formal comments in the above-captioned proceeding.

The issue of PIC charge reduction was addressed in New Jersey in 1999 as part of a global introduction of intraLATA toll competition that commenced in 1997.<sup>1</sup> A settlement among the parties achieved reduced PIC charges for many New Jersey ratepayers. The Ratepayer Advocate submits for the Commission's information and review the briefs submitted by the Ratepayer Advocate in that proceeding, which set forth the parameters for investigation relied upon by the Ratepayer Advocate, and which may be well-utilized by the Commission in

<sup>1/</sup> See I/M/O the Filing by Bell Atlantic-New Jersey, Inc. For Revisions to Tariff B.P.U. No. 2, Access Service Providing for Rates and Charges in Connection with the Provision of IntraLATA Presubscription, New Jersey Public Utilities (903) 424-0147, 97-0462 (9/3/97) 5-4-2123 No. 1886-GT-1575039643-3084  
<http://www.rpa.state.nj.us> E-Mail: [njratepayer@rpa.state.nj.us](mailto:njratepayer@rpa.state.nj.us)

any National determination. Speaking generally, the Ratepayer Advocate submits that the introduction of automation reduces greatly the cost to effect PIC changes. Further, a simultaneous PIC change, in which new intraLATA and interLATA carriers are selected, should be assessed only a single charge.

The undersigned may be contacted should you have any questions or require additional information.

Respectfully submitted,

SEEMA M. SINGH, Esq.  
RATEPAYER ADVOCATE

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